CALIFORNIA DEPARTMENT OF Mental Health

MHSA Behavioral Health
Electronic Health Record (EHR) Practice Management Criteria
2nd Draft - Response to Public Comments
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Category	Criteria Number	Name	Title	Organization	Commenting for Organization	Stakeholder Category	Comment	Action	Response
		Concensus					2/28/08 Missing Legend for Functional Requirements Index…Would be helpful to have.		
	NEW	Kacey Vencill		Sacramento Co.			2/28/08 An algorithm-based search criteria like Soundex…You get the right John. (See Section 1.006 discussions which prompted this suggestion.)		
		Kacey Vencill					3/4/08 Glossary Needed: Provider, User, Client (Defined).		
		Jeanne Albertson					3/4/08 Report Generation Section (28) Needs: Ability of reports to interface with some sort of encryption program. Kacey Vencill replied encryption is addressed in the Infrastructure Section.		
		Donna Yim					3/4/08 Category 28...Whole category: ADD Who ran report at which time? A log needs to be added. See 28.041…Addressed here.		
		Rita Scott-York, Donelly Smith, and Memo Keswick					3/7/08 Which section should Management Alerts be included in? Not only Support Staff Alerts, but Management Alerts should be included. Make sure adequately addressed throughout Administrative Workflow Criteria Sections of 41, 42, 43, and elsewhere. Donelly Smith commented that in Section 26.002 Licenses/Dates are addressed.		
F-01	1.001								
F-01	1.002								
F-01	1.003	Suzanne Smith		Orange Co.			2/28/08 COMMENTS: Interoperability additional client identifiers WITH A MINIMUM OF three.		
F-01	1.003	Kacey Vencill					2/28/08 ADD "The system shall provide the ability to look up the client using ANY of the identifiers."		
F-01	1.004								
F-01	1.005								
F-01	1.006	Paul Vossen		Sac Co. Child MH			2/28/08 Should be more than one. COMMENTS: Example: Medical Record Number and Social Security Number.		
F-01	1.006	Kacey Vencill					2/28/08 ADD SCIN Number, Name		
F-01	1.006	Orange County					2/28/08 Configurable for the actual location to create a field that is searchable as well, and "some of them can be configurable by the user."		
F-01	1.006	Donley Smith		ECHO			2/28/08 Importance of Indexed fields. User-defined such as address cannot be indexed ADD Driver's License Number.		
F-01	1.006	Kacey Vencill					2/28/08 More than one means of identifying, and there is a difference between searching and identifying. See 1.003 because they are listed there.		
F-01	1.006	Kacey Vencill					2/28/08 NEW Requirement To Be Added Elsewhere: An algorithm-based search criteria like Soundex…You get the right John.		
F-01	1.006	Concensus					2/28/08 See Section 2.016 Comments.		

Category	Criteria Number	Name	Title	Organization	Commenting for Organization	Stakeholder Category	Comment	Action	Response
F-01	1.007								
F-01	1.008								
F-01	1.009								
F-01	1.010								
F-01	1.011	Kacey Vencill					2/28/08 "I don't know what this means." Strike the first integrate WITH.		
F-01	1.011	Kathleen Murray		Orange County			2/28/08 Does this mean interface between two systems? Cannot tell what is meant here.		
F-01	1.012								
F-01	1.013								
F-01	1.014								
F-01	1.015	Kacey Vencill					2/28/08 System administrators is throwing me. Don't get it. The system shall link, and delete the words "Allow system administrators to."		
F-01	1.015	Donley Smith					2/28/08 Sounds like "Can you report on these things."		
F-01	1.015	Unidentified Person					2/28/08 Asking the system to be relational…Just trying to make sure the system talks to itself, but cannot understand why it would not.		
F-01	1.015	Memo Keswick	Facilitator				2/28/08 Test scripts, etc., If it did not include allow system administrators…Shall produce a report.		
F-01	1.015	Unidentified Person(s)					2/28/08 Reports on top of any other functionality. System shall link…this is broad…testing, reporting, on-line screen. Duplicity.		
F-01	1.016	Linda Billings					2/28/08 Will be client with same name and DOB. If it was related to the unique identifier, because if you add SSN, or is this some kind of duplicate check?		
F-01	1.016	Memo Keswick					2/28/08 Automatically, added-on content. Look at this in reference to 1.003, describing ways to check for duplicates?		
F-01	1.016	Linda Billings		Alameda County			2/28/08 Not sure it is really relevant.		
F-01	1.016	Kacey Vencill					2/28/08 Change "i.e," (that is) to "e.g.," (such as) "Example." NOT CLEAR.		
F-01	1.016	Donley Smith					2/28/08 Context from these questions is not shown, so it makes it not clear. Where is the context, and may be redundant because we don't know what they mean. Would make it much more clear if context was there.		
F-01	1.016	Memo Keswick					2/28/08 Memo explained category descriptions.		
F-01	1.016	Unknown Person					2/28/08 Before new patient identifier is established.		
F-01	1.016	Kathleen Murray					2/28/08 There are 3 points, when the check occurs…, supporting prior to establishing a unique identifier, needs to be placed in front of the criteria.		
F-01	2.018								
F-02	2.001	Kathleen Murray					2/28/08 This section Explains 11, 12, and 15 above, but does not talk about linking.		
F-02	2.002								
F-02	2.003								
F-02	2.004								

Category	Criteria Number	Name	Title	Organization	Commenting for Organization	Stakeholder Category	Comment	Action	Response	
F-02	2.005									
F-02	2.006	Kacey Vencill					2/28/08 System shall allow client demographic data (Period…the end) or give what California statewide accounting means. Find requirements. Flexible to accommodate data collection and additional needs. Forget this. Better solution should be CSI and CalOMS (ADP) as examples in the comments.			
F-02	2.006	Kathleen Murray					2/28/08 CSI, Cal OMS system can gather…flexible to add things as they come up.			
F-02	2.006	Suzanne Smith					2/28/08 System will allow users to add additional fields.			
F-02	2.006	Kathleen Murray					2/28/08 Can add to and change demographic fields. Define and Add.			
F-02	2.006	Memo Keswick					2/28/08 Utilizing "changing" would be modifying? CA Statewide reporting. So we would be flexible.			
F-02	2.006	Donley Smith					2/28/08 Nice to be able to add fields. Vendor must do CSI reporting. System should always have whatever fields are required for CSI reporting.			
F-02	2.006	Kathleen Murray					2/28/08 Disagree. We do our own reporting.			
F-02	2.006	Kacey Vencill					2/28/08 System shall allow Flexibility to collect and report all data required for California State Reporting (local, state, federal).			
F-02	2.006	Kathleen Murray					2/28/08 Okay with State, Federal, Local.			
F-02	2.007	Kacey Vencill					2/28/08 Is that talking about looking them up?…I don't get it.			
F-02	2.007	Unidentified Person					2/28/08 Alias, if one is looked up, both names should be listed?			
F-02	2.007	Kacey Vencill					2/28/08 "Go back to 1.014…Cross checking. When presenting data to view. If the key to that is view."			
F-02	2.007	Memo Keswick					2/28/08 Memo clarified…2.007 is about viewing.			
F-02	2.007	Concensus					2/28/08 Confusion about what this means.			
F-02	2.008	Paul Vossen					2/28/08 Is there any more detail needed?... Capture insurance information…Maybe Examples of what we need could be listed.			
F-02	2.008	Memo Keswick					2/28/08 Original writers of this criteria…Requirements for insurance…written at the high level just to make sure it was included. Make sure system could capture it.			
F-02	2.008	Rita Scott-York		Humboldt County			2/28/08 "Should it make sure HIPAA 837 Requirements are met so you don't have to give examples?"			
F-02	2.008	Kathleen Murray					2/28/08 If you are asking the system to capture all of the required fields to create an 837 (which is a good source document).			
F-02	2.008	Donley Smith					2/28/08 It should capture insurance data enough to make a HIPAA-compliant claim.			

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F-02	2.009	Unknown Person					2/28/08 What does "more than one identical type data record" mean? There are sections that talk about merging records much more clearly.		
F-02	2.009	Memo Keswick					2/28/08 When two patients are discovered to be the same person, and it is determined that the record should be merged.		
F-02	2.009	Donley Smith					2/28/08 "Another case of tortured wording."		
F-02	2.010	Kacey Vencill					2/28/08 Criteria: "Highlighting" changed to "Identifying."		
F-02	2.010	Rita Scott-York					2/28/08 "Or add Example Highlighting."		
F-02	2.011								
F-02	2.012								
F-02	2.013								
F-02	2.014								
F-02	2.015								
F-02	2.016	Paul Vossen					2/28/08 "Is this a duplicate with 1.006?		
F-02	2.016	Kacey Vencill					2/28/08 "Is this a duplicate with 1.006?		
F-02	2.016	Rita Scott-York					2/28/08 "This is a better statement than we were adding in the previous (Section 1.006)."		
F-02	2.016	Donley Smith					2/28/08 "Merge Section 2.016 with Section 1.006 combine and get the best out of both of them."		
F-02	2.017								
F-02	2.019								
F-15	15.001								
F-15	15.002								
F-15	15.003								
F-15	15.004								
F-15	15.005								
F-15	15.006								
F-15	15.007								
F-15	15.009	Kacey Vencill					2/28/08 "Data entry process should have different words…It should be proactively showing you." Proactive System Notification. During data entry process should have better language than that.		
F-15	15.009	Donley Smith					2/28/08 Adding it to be service entry instead of data entry. System shall notify users of missing or expired entries during service entry.		
F-15	15.009	Kathleen Murray					2/28/08 "I agree with Donelly"... Adding it to be service entry instead of data entry. System shall notify users of missing or expired entries during service entry.		
F-15	15.009	Unidentified Person					2/28/08 Service not be within the Treatment Plan.		
F-15	15.009	Kathleen Murray					2/28/08 This section was the signing of the Treatment Plan?		

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F-15	15.009	Rita Scott-York					2/28/08 Are we talking about 2 components…I am not understanding is it Authorization for Services or for Treatment Plan, Managed Care or ALL?		
F-15	15.009	Memo Keswick					2/28/08 Client's Consent and Authorization. Refer to 30.008…Still in CBS coloring.		
F-15	15.009	Kacey Vencill					2/28/08 Managed Care?		
		Kacey Vencill					3/4/2008 General Question for this Page (Page 13): Directories of users (on this page) what is that? Is this security-related, if so don't limit it …Credentialing?		
F-20	20.001	Donna Yim		San Joaquin County			3/4/08 What does this refer to?		
F-20	20.002	Kacey Vencill					3/4/08 Duplicity from previous security discussion?		
F-20	20.002	Memo Keswick					3/4/08 We are in the Provider Demographics Category.		
F-20	20.002								
F-20	20.003								
F-20	20.004								
F-24	24.001								
F-24	24.003								
F-26	26.001								
F-26	26.002								
F-26	26.003								
F-26	26.004								
F-26	26.005								
F-26	26.006								
F-26	26.007								
F-26	26.008								
F-26	26.009	Unknown Person					3/4/08 Remove plurality of supports.		
F-26	26.009	Keith Harris		San Bernardino			3/4/08 Would the revenue be associated with service? Somewhere in the system we would be able to link things together in different combinations. One provider with service which would be different at a different location.		
F-26	26.009	Memo Keswick					3/4/08 Might be in the infrastructure component. "Yes. It is somewhere else…Look for it…If it is not even in there, then let us know."		
F-27	27.001								
F-27	27.002	Suzanne Smith-Ellis		Orange County			3/4/08 Will this interface directly to the system?		
F-27	27.002	Memo Keswick					3/4/08 Interface versus completely different scheduler system.		

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F-27	27.002	Suzanne Smith-Ellis and Kacey Vencill					3/4/08 "The system shall contain or interface to " Add "contain or."		
F-27	27.003								
F-27	27.004								
F-27	27.005								
F-27	27.006								
F-27	27.007								
F-27	27.008								
F-27	27.009								
F-27	27.010								
F-27	27.011								
F-27	27.012								
F-27	27.013								
F-27	27.014								
F-27	27.015								
F-27	27.016								
F-27	27.017								
F-27	27.018								
F-27	27.019								
F-27	27.020								
F-27	27.021	Kacey Vencill					3/4/08 Is it like scheduling an appointment and then inviting multiple people once the appointment is scheduled? "The system shall (allow…not assist) coordinating multiple providers addressing multiple problems during one visit….One stop shop.		
F-27	27.021	Ginger Gramm					3/4/08 I think it is for multiple consultants, so that a patient can come in and get referred to a specialist on the same appointment and then go see another specialist and then return back to their doctor.		
F-27	27.021	Donley Smith					3/4/08 Different people on the same day.		
F-27	27.021	Kacey Vencill					3/4/08 Reword for clarity.		
F-27	27.021	Jeanne Albertson		Humboldt			3/4/08 There should be 3 Requirements: One enables a single appointment for a client with multiple providers. Second, schedule consecutive appointments with single client and multiple providers. Third, would be group therapy a single provider with multiple clients.		
F-27	27.021	Donna Yim					3/4/08 Scheduling piece for walk-in clients, so any staff could check availability of the providers that can take the walk-in.		
F-27	27.021	Jeanne Albertson					3/4/08 Not only a provider, but also a timeslot.		
F-27	27.022								
F-27	27.023								
F-27	27.024								
F-27	27.025								
F-27	27.026								

Category	Criteria Number	Name	Title	Organization	Commenting for Organization	Stakeholder Category	Comment	Action	Response	
F-27	27.027	Donna Yim					3/4/08 ADD "Notify clients of upcoming appointments or reschedule. Autodial for upcoming appointments."			
F-27	27.028									
F-27	27.029									
F-27	27.030	Kacey Vencill					3/4/08 Combine 27.010 with 27.030?			
F-27	27.031	Jeanne Albertson					3/4/08 Not sure what this is?			
F-27	27.031	Memo Keswick					3/4/08 Regarding scheduling, resources available for clinician.			
F-27	27.031	Kacey Vencill					3/4/08 More clear if omitted "requirements," or just have "required?"			
F-27	27.031	Donna Yim					3/4/08 Scheduling for interpretive services, equipment for interpreters. Schedule an appointment for certain types of equipment.			
F-27	27.032									
F-27	27.033									
F-27	27.034									
F-27	27.035									
F-27	27.036									
F-27	27.037									
F-27	27.038									
F-27	27.039									
F-27	27.040	Kacey Vencill					3/4/08 Looks like 27.040 is a duplicate with 27.027 and 27.043?			
F-27	27.040	Memo Keswick					3/4/08 One is for user-selected clients versus everybody.			
F-27	27.041									
F-27	27.042									
F-27	27.043	Donna Yim					3/4/08 Is that a duplicate of 27.027? One is letter and one is mailing?			
F-27	27.044									
F-27	27.045	Donna Yim					3/4/08 Is this duplicate for the previous…Followup letters, generate scheduling module, multiple reminder, etc.			
F-27	27.045	Kacey Vencill					3/4/08 Letters produced in language appropriate to the Client. Correspondence can be communicated is a much broader requirement …Go to a higher level.			
F-27	27.046									
F-28	28.001									
F-28	28.002	Suzanne Smith-Ellis	Orange County				3/4/08 Reports…Column 4 "May be in plain text." Should we also specify that it be in different formats for flexibility?			
F-28	28.002	Donna Yim					3/4/08 I agree that it should be available in preferred format otherwise it is too wide open. Plain text or Excel format should be enough.			
F-28	28.002	Kacey Vencill					3/4/08 Require PDF so that it is portable.			

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F-28	28.002	Jeanne Albertson / Donna Yim / Kacey Vencil					3/4/08 Not only this requirement, but any report should have plain text, Excel, or PDF. (See below for XML addition.)		
F-28	28.003								
F-28	28.004								
F-28	28.005	Kacey Vencill					3/4/08 Question mark?		
F-28	28.005	Memo Keswick					3/4/08 Main thrust of MHSA EHR/PHR in the future, interoperability.		
F-28	28.005	Donna Yim					3/4/08 All reports should be able to upload/download plain text, Excel, PDF, and XML.		
F-28	28.005	Suzanne Smith-Ellis					3/4/08 We use XML quite a bit.		
F-28	28.006								
F-28	28.007								
F-28	28.008								
F-28	28.009								
F-28	28.010								
F-28	28.011								
F-28	28.012	Paul Vossen					3/4/08 Report capability…asking for Cadillac version for sure. Is this "Mission Impossible?"		
F-28	28.013	Kacey Vencill					3/4/08 Remove .mdb…I've never seen .		
F-28	28.013	Donna Yim							
F-28	28.013	Roger Kreutz		Humboldt			3/4/08 Leaving .mdb in there would be okay because Excel does the same thing.		
F-28	28.013	Donna Yim					3/4/08 If mdb stays, then add XML.		
F-28	28.013	Concensus					3/4/08 EVERYONE AGREES TO LEAVE .MDB AND ADD XML. (See also 28.023.)		
F-28	28.014								
F-28	28.015								
F-28	28.016	Kacey Vencill					3/4/08 Should there be other indicators listed or we could mention any of the measures required by DMH POQI. Outcome requirements. POQI-specific or language speaking to any other outcomes required.		
F-28	28.017	Donley Smith / Jeanne Albertson					3/4/08 No one really knows what any one county's quality assurance program is, and vendor does not know what the quality assurance program description is. Better wording. Every county can do it different. Further County-Specific definition required for RFP.		
F-28	28.017	Ginger Gramm					3/4/08 Should it be customizable for each county?		

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F-28	28.017	Donna Yim/Jeanne Albertson					3/4/08 Covers intent.		
F-28	28.018	Donley Smith / Jeanne Albertson					3/4/08 No one really knows what any one county's quality assurance program is, and vendor does not know what the quality assurance program description is. Better wording. Every county can do it different. Further County-Specific definition required for RFP.		
F-28	28.018	Donna Yim / Jeanne Albertson					3/4/08 Covers intent.		
F-28	28.019	Donley Smith / Jeanne Albertson					3/4/08 No one really knows what any one county's quality assurance program is, and vendor does not know what the quality assurance program description is. Better wording. Every county can do it different. Further County-Specific definition required for RFP.		
F-28	28.019	Donna Yim / Jeanne Albertson					3/4/08 Covers intent.		
F-28	28.020	Jeanne Albertson		Humboldt			3/4/08 Customizable.		
F-28	28.020	Donna Yim					3/4/08 User-defined criteria.		
F-28	28.021	Jeanne Albertson					3/4/08 Customizable.		
F-28	28.021	Donna Yim					3/4/08 User-defined criteria.		
F-28	28.022								
F-28	28.023	Roger Kreutz					3/4/08 ADD XML NOT remove .mdb. (See also 28.013.)		
F-28	28.023	Concensus					3/4/08 EVERYONE AGREES TO LEAVE .MDB AND ADD XML. (See also 28.013.)		
F-28	28.024	Kacey Vencill					3/4/08 Referring to ODBC…This may be duplicative in infrastructure.		
F-28	28.024	Donna Yim					3/4/08 Referring to ODBC…It may belong better in infrastructure.		
F-28	28.025								
F-28	28.026								
F-28	28.027	Kacey Vencill					3/4/08 Development of standard data cubes NOT Rectangles. Replace "cubes" with "rectangles."		
F-28	28.027	Keith Harris					3/4/08 I agree…"data cubes" is a terminology I'm more familiar with.		
F-28	28.028								
F-28	28.029								
F-28	28.030								
F-28	28.031								

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F-28	28.032									
F-28	28.033	Jeanne Albertson					3/4/08 Understood reports in realtime and not from a backup. If not asking more than once a day, nothing other than realtime.			
F-28	28.034	Kacey Vencill					3/4/08 Text has nested requirements. Reviewed for containing multiple requirements or breaking them up separately. Same wording which needs to be split out. Delete second sentence in 28.034 because it exists in 28.035.			
F-28	28.035	Kacey Vencill					3/4/08 Same wording which needs to be split out. Delete second sentence in 28.034 because it exists in 28.035.			
F-28	28.036									
F-28	28.037	Kacey Vencill					3/4/08 "Ability to readily resolve nonmatching data." "Ability to readily resolve the errors on the report." Does not necessarily mean much nor that it is a problem.			
F-28	28.038	Rita Scott-York					3/4/08 Allow AUTHORIZED staff instead of trained county staff.			
F-28	28.039									
F-28	28.040	Paul Vossen					3/4/08 Covered on realtime or retrospective?			
F-28	28.041	Donna Yim					3/4/08 ADD Who ran report at which time? A log needs to be added. See 28.041…Addressed here.			
F-28	28.041	Kacey Vencill					3/4/08 "Usage Patterns," Should say service or client utilization patterns.			
F-28	28.042									
F-28	28.043									
F-28	28.044	Suzanne Smith-Ellis					3/4/08 Population-based studies based on flexible, end-user modifiable criteria? Define what population means.			
F-28	28.044	Memo Keswick					3/4/08 Is this clear enough? Borrowing what counties used previously. Intent from DMH is to develop test scripts.			
F-28	28.044	Kacey Vencill					3/4/08 Add in comments to bring clarity.			
F-28	28.045	Suzanne Smith-Ellis					3/4/08 Define case mix reports. (See Tracy Herbert's Explanation Below.)			
F-28	28.045	Memo Keswick					3/4/08 On-demand might be the same as drop-in.			
F-28	28.045	Tracy Herbert		Sacramento County			3/4/08 (Clarification of what is meant by Case Mix) Case mix is to search by different things such as diagnosis, categories of caseloads, etc.			
F-28	28.046	Donna Yim					3/4/08 Is this the one which has tracking mechanism for assessments, treatment plans…tickler list to the staff member involved. Is it the reminder that you have open items? (After Memo's clarification, Donna agreed.)			

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F-28	28.046	Memo Keswick					3/4/08 That is how I thought it was meant to be.		
F-28	28.047	Paul Vossen / Donna Yim					3/4/08 System create reminders to clients, but does not say how…Too vague…should be in the scheduling portion.		
F-28	28.047	Suzanne Smith-Ellis					3/4/08 Or this should be able to create reports of what was sent out.		
F-28	28.047	Paul Vossen					3/4/08 Maybe it is for reports for managers. Clarify intent either administrative reports versus to clients. Address whether combined with scheduler criteria.		
F-30	30.016								
F-30	30.021								
F-30	30.022								
F-30	30.023								
F-30	30.027								
F-31	31.002	Tracy Herbert					3/4/08 Go back …An appropriate code.		
F-31	31.002	Jackie Mortensen					3/4/08 Should not be limited to CPT, and E&M only, but to other codes.		
F-31	31.002	Jeanne Albertson					3/4/08 Needs to be listed somewhere that when these interfaces change, there is ease in capturing the new data.		
F-31	31.002	Memo Keswick					3/4/08 Think of how it relates to a requirement related to DMH.		
F-31	31.002	Donley Smith					3/4/08 Ability to take local codes and translate them to any other specific coding scheme, like a crosswalk. Question: E&M is more medical. Did it come from CCHIT, more medical?		
F-31	31.003								
F-31	31.004								
F-31	31.005								
F-31	31.006								
F-31	31.007	Jeanne Albertson					3/4/08 Are these duplicates?…Memo agreed.		
F-31	31.008								
F-31	31.009								
F-31	31.010								
F-31	31.011	Donley Smith					3/4/08 Evaluation and management codes?		

Category	Criteria Number	Name	Title	Organization	Commenting for Organization	Stakeholder Category	Comment	Action	Response
F-31	31.011	Memo Keswick					3/4/08 Requirements…More recent ones and importance of using them. Requirements for coding. When service is provided, service description, therefore use this CPT code. Finding the right codes to define. (Informational...E&M (Evaluation and Management) is separate from MEDS. E&M: Coding what you did as to whether anybody can pay you for. MEDS: Specific to Medi-Cal Elligibility-specific. All counties have access to…they got cut off. MMEF is an extract from that database which is a separate file for loading into their systems.)		
F-31	31.011	Donley Smith					3/4/08 E&M are similar standards, but they are not CPT Codes.		
F-31	31.011	Jackie Mortensen					3/4/08 Is this all procedure codes are going to be discipline-specific? I don't understand why is it specific to nurses and physicians. (See Comments in 31.012 regarding Primary and Secondary Co-Staff.)		
F-31	31.011	Donley Smith					3/4/2008 Reduced to appropriate crosswalks and standards.		
F-31	31.012	Jeanne Albertson					3/4/08 Parenthetical information…Question…		
F-31	31.012	Memo Keswick					3/4/08 Consultant looking at documentation in Coalition…potential requirement…Describing it better. DMH needs to take a hard look at E&M…Replaced by crosswalks, used for specific disciplines or not, clearly defined in requirement.		
F-31	31.012	Jackie Mortensen					3/4/08 Would like to see who is providing the service? Primary and secondary providers…There could be more than one co-staff. Should primary and secondary co-staff be addressed as well?		
F-31	31.013								
F-31	31.014								
F-32	32.001								
F-32	32.002								
F-32	32.003	Keith Harris					3/4/08 MEDS may change. ADD: Or any replacement eligibility determination methodology.		
F-32	32.003	Donley Smith					3/4/08 Change wording…too confusing about what is going on because everything is changing. Loading of MEDS is incorrect. Loading of MEDS versus MMEF (Monthly Medical Eligibility Extract File).		

Category	Criteria Number	Name	Title	Organization	Commenting for Organization	Stakeholder Category	Comment	Action	Response	
F-32	32.003	INFORMATIONAL					E&M (Evaluation and Management) is separate from MEDS. E&M: Coding what you did as to whether anybody can pay you for. MEDS: Specific to Medi-Cal Elligibility-specific. All counties have access to. MMEF is an extract from that database which is a separate file for loading into their systems.			
F-32	32.004	Kacey Vencill					3/5/08 Comments: Load eligibility record…Business case for all eligible…County versus Statewide need-to-know. Specific to County?			
F-32	32.005	Memo Keswick					3/4/08 Let us take this back to management to see which ones we need to return to you for replacement eligibility determination methodology.			
F-32	32.005									
F-32	32.006	Kacey Vencill					3/5/08 What is meant? What is "evaluation" of eligibility.			
F-32	32.006	Memo Keswick					3/5/08 Insurance may not cover.			
F-32	32.007									
F-32	32.008									
F-32	32.009	Jackie Mortensen					3/5/08 Share-of-Cost: During change of parameter in verification process, when a client is on Medi-Cal, unknown County until Share-of-Cost is met. How is information going to be read, when system is saying "Unknown County?"			
F-32	32.010	Jackie Mortensen					3/5/08 Client's current Medi-Cal eligibility…Indicating 3rd-Party Payors will be included. Currently it only loads Medi-Cal, not 3rd-Party payor. Is this new? Insurance, etc. Requirement for ability for other payor information for MMEF capacity to import other payor source information? Otherwise, what does included payors mean?			
F-32	32.010	Memo Keswick					3/5/08 MEDS review share-of-costs will become Medi-Cal eligible…What tools does county have to incorporate…Look up Share-Of-Costs references.			
F-32	32.011	Memo Keswick					3/5/08 DMH will look at any MEDS reference. Difference between MEDS system and the MMEF file. Look up Share-Of-Costs references.			
F-32	32.011	Donley Smith					3/5/08 Never a set way to represent data in order to parse. MMEF file does not have anything like that which makes it difficult to do.			
F-32	32.012	Donley Smith					3/5/08 Never a set way to represent data in order to parse. MMEF file does not have anything like that which makes it difficult to do.			
F-32	32.013									
F-32	32.014									
F-32	32.015									
F-32	32.016									

Category	Criteria Number	Name	Title	Organization	Commenting for Organization	Stakeholder Category	Comment	Action	Response	
F-32	32.017									
F-32	32.018									
F-32	32.019									
F-32	32.020	Kacey Vencill					3/5/08 Where the 48-hour benchmark came in? If no rule for 48-hours, can it allow for a time rule. Who is scheduled with a configurable amount of time. Because 48 hours may or may not make sense. Section 32.005 includes info regarding 270/271.			
F-32	32.020	Jackie Mortensen					3/5/08 Is there a similar process like 270/271? Terminology checked for new processes. MMEF is a file you get once a month, but eligibility checking occurs more than that. 270/271 is more current than MMEF.			
F-32	32.021	Kacey Vencill					3/5/08 Not sure this is a wanted requirement by counties. System shall provide notification of a patient's loss of eligibility to County.			
F-33	33.001									
F-33	33.002	Jackie Mortensen					3/5/08 Capacitiy to Differentiate Different Types of providers. Example: MD versus Psychologist. ADP versus DMH.			
F-33	33.003	Jackie Mortensen					3/5/08 Capacitiy to Differentiate Different Types of providers. Example: MD versus Psychologist. ADP versus DMH.			
F-33	33.004									
F-40	40.001	Jane Tzudiker					3/5/08 Mandated reporting data definition…All mandated reports. Examples needed.			
F-40	40.001	Kacey Vencill					3/5/08 New requirement that this system generate the 997 (HIPAA) acknowledgement of file. If passes validation, a positive 997 response, if accepting an 837 incoming.			
F-40	40.002									
F-40	40.003	Natalie Courson					3/5/08 Clarification…Thought that counties collected MHSA data and would be transmitting back to State.			
F-40	40.003	Memo Keswick					3/5/08 Correct language to develop DCR, etc., DMH already knows a harder look to specificity…Review/clarification needed.			
F-40	40.004									
F-40	40.005									
F-40	40.006									
F-40	40.007									
F-40	40.008									
F-40	40.009	Jackie Mortensen					3/5/08 What types of crosswalks for local codes to values?			
F-40	40.009	Memo Keswick								
F-40	40.009	Donley Smith					3/5/08 All data items that show up on a Claim, etc. goes through a crosswalk…Broad, but accurate.			
F-40	40.009	Kacey Vencill					3/5/08 Why noncompliant item included?			

Category	Criteria Number	Name	Title	Organization	Commenting for Organization	Stakeholder Category	Comment	Action	Response	
F-40	40.009	Memo Keswick					3/5/08 If still doing paper, can you continue to do paper. Larger perspective, possibly speaking of explanation of balances to clients. Big accounts-payable aspect is the scope to focus on. Rita agrees. Differentiate better? What EOB we are referring to? Counties will continue to provide some paper EOB support. EOBs could be county to provider/contract, or possibly county to client.			
F-40	40.010	Jackie Mortensen					3/5/08 ADD CalOMS.			
F-40	40.011	Jackie Mortensen					3/5/08 More detail needed for crossovers, copayments, or deductibles.			
F-40	40.012									
F-40	40.013									
F-41	41.001									
F-41	41.002									
F-41	41.003	Jackie Mortensen					3/5/08 Shall be automated and adjudicated and/or denied per claim basis.			
F-41	41.004									
F-41	41.005									
F-41	41.006									
F-41	41.007									
F-41	41.008									
F-41	41.009									
F-41	41.010									
F-41	41.011									
F-41	41.012									
F-41	41.013									
F-41	41.014									
F-41	41.015									
F-41	41.016									
F-41	41.017									
F-41	41.018									
		Rita Scott-York					3/5/08 For all Category 42, Link accounts receivable information easily for cost-reporting purposes.			
F-42	42.001									
F-42	42.002									
F-42	42.003									
F-42	42.004									
F-42	42.005	Kacey Vencill					3/5/08 Need adjusted wording. System shall adjust/correct as appropriate. Is this is in response to a negative 997 or is this the line-item services within transaction?			

Category	Criteria Number	Name	Title	Organization	Commenting for Organization	Stakeholder Category	Comment	Action	Response	
F-42	42.006									
F-42	42.007									
F-42	42.008									
F-42	42.009	Jackie Mortensen					3/5/08 Include references to ADP billing rules…(Missing). Better to include all then add later.			
F-42	42.009	Linda Billings					3/5/08 Say anything about SB900 rates? Necessary to include negotiated rates billing here.			
F-42	42.010									
F-42	42.011									
F-42	42.012									
F-42	42.013									
F-42	42.014									
F-42	42.015									
F-42	42.016									
F-42	42.017	Kacey Vencill					3/5/08 Split out nested requirements into 2 or 3 separate requirements.			
F-42	42.018									
F-42	42.019									
F-42	42.020									
F-42	42.021									
F-42	42.022									
F-42	42.023									
F-42	42.024									
F-42	42.025									
F-42	42.026									
F-42	42.027									
F-42	42.028									
F-42	42.029									
F-42	42.030									
F-42	42.031									
F-42	42.032									
F-42	42.033									
F-42	42.034									
F-42	42.035									
F-42	42.036									
F-42	42.037									
F-42	42.038									
F-42	42.039	Donley Smith					3/5/08 Many counties do not utilize SMAs as the billing rate…So what does this mean? Compare what you charge with what you can charge…ADD "Shall provide tables to enter SMAs (Memo Keswick)." More clear (Donley).			
F-42	42.040									

Category	Criteria Number	Name	Title	Organization	Commenting for Organization	Stakeholder Category	Comment	Action	Response
F-42	42.041								
F-42	42.042								
F-42	42.043								
F-42	42.044								
F-42	42.045								
F-42	42.046								
F-42	42.047								
F-42	42.048								
F-42	42.049								
F-42	42.050								
F-42	42.051								
F-42	42.052								
F-42	42.053								
F-42	42.054								
F-42	42.055								
F-42	42.056								
F-42	42.057								
F-42	42.058								
F-42	42.059								
F-42	42.060								
F-42	42.061								
F-42	42.062	Memo Keswick					3/5/08 Comments: Reference to AB2034 should be still included?		
F-42	42.063								
F-42	42.064	Memo Keswick					3/5/08 Is this still needed given 837/835 Directions?		
F-42	42.065								
F-42	42.066								
F-42	42.067								
F-42	42.068								
F-42	42.069								
F-42	42.070								
F-42	42.071								
F-42	42.072								
F-42	42.073								
F-42	42.074								
F-42	42.075								
F-42	42.076								
F-42	42.077								

Category	Criteria Number	Name	Title	Organization	Commenting for Organization	Stakeholder Category	Comment	Action	Response	
F-42	42.078	Donley Smith					3/5/08 Charge entry…Should the system do it automatically? Clarify charge entry in relationship to activities such as displaying primary, secondary, tertiary insurance. Is done at service entry time or automatically through background processes? During charge entry, hierarchy scaling...which insurance gets billed first? What does charge entry mean? Not appropriate to change insurance rankings at that time.			
F-42	42.078	Linda Billings					3/5/08 Should this provide some options so that at times a service and its associated charge can be entered with a corresponding linkage to appropriate insurance level? Would not be good to mention vendors. During charge entry is not clear and needs clarification which would then explain the end of the sentence.			
F-42	42.079									
F-42	42.080									
F-42	42.081									
F-42	42.082									
F-42	42.083									
F-42	42.084									
F-42	42.085									
F-42	42.086									
F-42	42.087									
F-42	42.088									
F-42	42.089									
F-42	42.090									
F-42	42.091	Memo Keswick					3/5/08 ADD word "with" between bills and all. Bills with all appropriate...			
F-42	42.092									
F-42	42.093									
F-42	42.094									
F-42	42.095									
F-42	42.096									
F-42	42.097	Jane Tzudiker					3/5/08 Example of how that would work?			
F-42	42.097	Memo Keswick					3/5/08 It could be that they have already sent a message to client about bill, and if client goes to a known scheduled appointment, a reminder flashes to stop by Billing Department. Alerted that client is on site and where they are at with paying their bill…Other interpretations invited...			
F-42	42.098									
F-42	42.099									
F-42	42.100									
F-42	42.101									
F-42	42.102									

Category	Criteria Number	Name	Title	Organization	Commenting for Organization	Stakeholder Category	Comment	Action	Response	
F-42	42.103									
F-42	42.104									
F-42	42.105									
F-42	42.106	Memo Keswick					3/5/08 Delete word "these," add at end "or payor site."			
F-42	42.107									
F-42	42.108									
F-42	42.109									
F-42	42.110									
F-42	42.111	Linda Billings					3/5/08 Typo of audit trail NOT TRIAL.			
F-42	42.112									
F-42	42.113									
F-42	42.114									
F-42	42.115	Jane Tzudiker					3/5/08 Conversation about what a Progress Note would contain in order to drive billing. Services that get billed. Does not contain correct Code. Needs to be audited off a list of criteria in order for a bill to go through.			
F-42	42.115	Memo Keswick					3/5/08 Not sure Progress Note validation is mentioned.			
F-42	42.115	Donley Smith					3/5/08 Previous Clinical Data meeting…Progress NoteTemplates could have required fields which are validated.			
F-42	42.115	Natalie Courson					3/5/08 Isn't this in the Clinical Section? Attempt to have valid Progress Notes best addressed in the Clinical Section.			
F-42	42.116									
F-42	42.117									
F-42	42.118									
F-42	42.119									
F-42	42.120									
F-42	42.121									
F-42	42.122									
F-42	42.123									
F-42	42.124									
F-42	42.125									
F-42	42.126									
F-42	42.127									
F-42	42.128									
F-42	42.129									
F-42	42.130									
F-42	42.131									
F-42	42.132									
F-42	42.133									

Category	Criteria Number	Name	Title	Organization	Commenting for Organization	Stakeholder Category	Comment	Action	Response	
F-42	42.134									
F-42	42.135									
F-42	42.136									
F-42	42.137									
F-42	42.138									
F-42	42.139									
F-42	42.140									
F-42	42.141									
F-42	42.142									
F-42	42.143									
F-42	42.144									
F-42	42.145									
F-42	42.146									
F-42	42.147									
F-42	42.148									
F-42	42.149									
F-42	42.150									
F-42	42.151									
F-42	42.152									
F-42	42.153									
F-42	42.154									
F-42	42.155									
F-42	42.156									
F-42	42.157									
F-42	42.158									
F-42	42.159									
F-42	42.160									
F-42	42.161									
F-42	42.162									
F-42	42.163									
F-42	42.164									
F-42	42.165									
F-42	42.166									
F-42	42.167									
F-42	42.168									
F-42	42.169									
F-42	42.170									
F-42	42.171									
F-42	42.172	Memo Keswick					3/5/08 Please fix the Font on this section (does not match).			

Category	Criteria Number	Name	Title	Organization	Commenting for Organization	Stakeholder Category	Comment	Action	Response	
F-42	42.173									
F-42	42.174									
F-42	42.175									
F-42	42.176	Ginger Gramm					3/5/08 Font too small.			
F-42	42.177									
F-42	42.178									
F-42	42.179									
F-42	42.180									
F-42	42.181									
F-42	42.182									
F-42	42.183									
F-42	42.184									
F-42	42.185									
F-42	42.186									
F-42	42.187									
F-42	42.188									
F-42	42.189									
F-42	42.190									
F-42	42.191									
F-42	42.192									
F-42	42.193									
F-42	42.194									
F-42	42.195									
F-42	42.196									
F-42	42.197									
F-42	42.198									
F-42	42.199									
F-42	42.200	Donley Smith					3/5/08 Usually day rate is billed, and not professional component…This looks backyards to me. Memo's Comment: Verify correct-as-written versus professional component should be substituted for board-and-care. It may be correct-as-written. Make sure this is compliant with Federal rules.			
F-42	42.201									
F-42	42.202									
F-42	42.203									
F-42	42.204									
F-42	42.205									
F-42	42.206									
F-42	42.207									
F-42	42.208									
F-42	42.209									

Category	Criteria Number	Name	Title	Organization	Commenting for Organization	Stakeholder Category	Comment	Action	Response
F-42	42.210								
F-42	42.211								
F-42	42.212								
F-43	43.001								
F-43	43.002								
F-43	43.004								
F-43	43.005								
F-43	43.006								
F-43	43.007								
F-43	43.008								
F-43	43.009								
F-43	43.010								
F-43	43.011	Rita Scott-York					3/7/08 Does anyone see a problem with E-mail? When E-mail systems are used, have the requirements adequately addressed Confidentiality and Security?		
F-43	43.012								
F-43	43.014								
F-43	43.015								
F-43	43.016								
F-43	43.017								
F-43	43.018								
F-43	43.019								
F-43	43.020								
F-43	43.021								
F-43	43.022								
F-43	43.023								
F-43	43.024	Memo Keswick					3/7/08 Remove the "s" from generates…it should be singular.		
F-43	43.025								
F-43	43.026								
F-43	43.027								
F-43	43.028								
F-43	43.029								
F-43	43.030								
F-43	43.031								
F-43	43.032								
F-43	43.033								
F-43	43.034								
F-43	43.035								
F-43	43.037	Ginger Gramm					3/7/08 Autopopulate is one word.		
F-43	43.052								

Category	Criteria Number	Name	Title	Organization	Commenting for Organization	Stakeholder Category	Comment	Action	Response	
F-43	43.053									
F-43	43.054									
F-43	43.055									
F-43	43.056									
F-43	43.057									
F-43	43.058	Suzanne Smith-Ellis					3/7/08 Should we include Confidentiality and Security here?			
F-43	43.059									
F-43	43.060									
F-43	43.061									
F-43	43.062									
F-43	43.063	Donley Smith and Memo Keswick					3/7/08 If you search by Encounter Diagnosis, you might pick up multiple clients and you might end up with data from multiple episodes for the same client. Retrieval and display of Encounter data does not have to be inclusive of the identifier and data might not be what you want. Diagnosis-Only search might result in multiple-client display. Search might actually be multiple parameters. Report versus what you need to see on the screen.			
F-43	43.064	Tyrone Smith					3/7/08 Alerts tied to business rules. Infers that the user has to make this manually happen. Set up business rules to automatically make these things happen. Manually forward alert or set business rules to automatically forward.			
F-43	43.065									
F-43	43.066	Tyrone Smith					3/7/08 Alerts tied to business rules. Infers that the user has to make this manually happen. Set up business rules to automatically make these things happen. Manually forward alert or set business rules to automatically forward.			
F-43	43.087									
F-43	43.088	Eric Neumann					3/7/08 Items 43.088 and 43.089 look like duplicates.			
F-43	43.089	Eric Neumann					3/7/08 Items 43.088 and 43.089 look like duplicates.			

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